

Edward W. Swanson, SBN 159859
SWANSON & McNAMARA LLP
300 Montgomery Street, Suite 1100
San Francisco, California 94104
Telephone: (415) 477-3800
Facsimile: (415) 477-9010

Attorney for ROBERT G. TUNNELL, JR.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT G. TUNNELL, JR.,

Defendant.

CASE NO. CR 11-0463 CRB (EDL)

**STIPULATION AND [PROPOSED]
ORDER MODIFYING CONDITIONS OF
PRE-TRIAL RELEASE TO PERMIT
CONTACT WITH INDIVIDUALS NOT
IDENTIFIED ON THE “NO-CONTACT
LIST” PROVIDED TO PROBATION**

STIPULATION

Defendant Robert G. Tunnell, Jr., by and through his counsel, Edward W. Swanson, and the United States, by and through Assistant United States Attorney W. Douglas Sprague, hereby stipulate and agree as follows:

1. On June 24, 2011, the Court set conditions of release for defendant Robert G. Tunnell, Jr., one of which was a condition that he have “no direct or indirect contact with former or current investors...”

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2 2. On April 20, 2012, the Court sentenced Mr. Tunnell to 57 months imprisonment,
3 followed by a term of supervised release.
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5 3. Special Condition number 8 of Mr. Tunnell's supervised release states that Mr.
6 Tunnell "shall not have contact with any individual specifically named on the list provided to the
7 probation office."

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9 4. On April 25, 2012, counsel for Mr. Tunnell provided the "no-contact list" to the
10 Probation Office pursuant to Special Condition number 8.

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12 5. Counsel for Mr. Tunnell conferred with AUSA Sprague to reach agreement on the
13 individuals named in the "no-contact list" before providing it to the Probation Office.
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15 6. The individuals whose names appear on the "no-contact list" are: Karen Arcuri,
16 Nan Brown, Jim Donohue, Linda Donohue, Erin Grey, Rebecca Hazard, Suzanne Riley, Gary
17 Woodworth, Kitty Woodworth, Joanne Zaremba.
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19 7. The parties HEREBY STIPULATE that the conditions of Mr. Tunnell's release
20 be modified to permit him to have contact with all individuals whose names do not appear on the
21 "no-contact list."
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23 8. Pretrial Services Officer Josh Libby has no objection to the proposed
24 modification.
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1
2 **IT IS SO STIPULATED.**
3

4 DATED: May 2, 2012

/s/
5 DOUG SPRAGUE
6 Assistant United States Attorney

7 /s/
8 EDWARD W. SWANSON
9 Swanson & McNamara LLP
10 Attorneys for ROBERT G. TUNNELL

11 **ORDER**
12

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: May 2, 2012

